

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

September 23, 2013

Re: Notice of *Ex Parte* Presentation
MM Docket No. 99-25 – Creation of a Low Power Radio Service

Dear Ms. Dortch:

On Friday, September 20, 2013, Sanjay Jolly of the Prometheus Radio Project spoke by telephone with Peter Doyle, Chief of the Media Bureau's Audio Division. Mr. Jolly asked Mr. Doyle a series of clarifying questions relating to the low power FM (LPFM) application process. First, he asked if LPFM applications are required to protect radio reading service stations that are no longer in operation. Many stations which broadcasted radio reading services prior to the first LPFM window when the Commission last collected data on these services are no longer doing so. Mr. Jolly argued that LPFM applicants should be able to document that a station is no longer providing reading services in an LPFM application. Second, Mr. Jolly asked whether LPFM applications are required to protect minor modifications filed by full power FM licensees after the June 17, 2013 public notice that announced the LPFM filing window. Specifically, he argued that if a proposed LPFM station will not cause interference to a recently moved full power station, such a station should be permitted even if it does not meet minimum distance separations from the newly moved full power station. Third, he argued that LPFM applicants in the October 2013 filing window should be able to apply for a channel from which an existing station has been authorized to move, but said station has not yet received a broadcast license for the new channel.

Respectfully Submitted,

/s/

Sanjay Jolly
Prometheus Radio Project

cc:
Peter Doyle